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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE PLUM BABY FOOD
LITIGATION

This Document Relates to:

ALL ACTIONS

) Case No. 21-cv-00913-YGR

) Hon: Yvonne Gonzalez Rogers

) **DECLARATION OF REBECCA A.
PETERSON IN OPPOSITION TO
DEFENDANT'S MOTION TO
DISMISS OR, IN THE
ALTERNATIVE TO STAY;
MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT
THEREOF**

) Date: January 11, 2022

) Time: 2:00 PM

) Courtroom: 1

**DECLARATION OF REBECCA A. PETERSON IN OPPOSITION TO
DEFENDANT'S MOTION TO DISMISS
CASE NO. 21-cv-00913-YGR**

1 I, Rebecca A. Peterson, declare as follows:

2 1. I am a partner at Lockridge Grindal Nauen P.L.L.P. and represent Plaintiffs in the
3 above-captioned matter. I submit this declaration in opposition to Defendant's Motion to Dismiss
4 or, in the Alternative, to Stay.

5 2. Attached hereto as Exhibit 1 is a true and correct copy of the U.S. House of
6 Representatives Committee on Oversight and Reform, Subcommittee on Economic and Consumer
7 Policy (the "Subcommittee") Staff Report dated September 29, 2021, and titled, "New Disclosures
8 Show Dangerous Levels of Toxic Heavy Metals in Even More Baby Foods," and internal Plum
9 test results, obtained and cited by and the Subcommittee, from 2017-2019 and 2019 to the present.
10

11 I declare under penalty of perjury under the laws of the United States that the foregoing is
12 true and correct.

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14 Executed this 1st day of December, 2021.

15 s/ Rebecca A. Peterson
16 Rebecca A. Peterson
17 *Attorney for Plaintiffs*
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